

DRAFT



The Parish of Caddo

Internal Audit of Parks and Recreation

SEPTEMBER 11, 2024

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Objective and Scope

An internal audit of the Caddo Parish Parks and Recreation (CPPR) Department was conducted to assess compliance with internal policies and procedures and evaluate the underlying processes and applicable internal controls. The following areas were included in the scope:

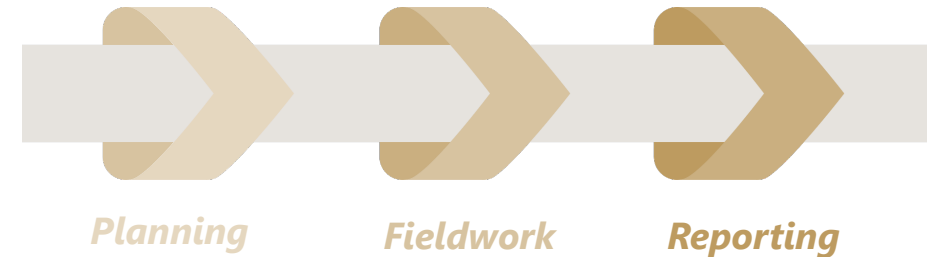
- ❑ Volunteer Background Checks
- ❑ Program and Event Fees
- ❑ Ongoing Monitoring of Grants

Overview of Procedures

-  Obtained policies and procedures (P&P) and other CPPR related documentation, as applicable.
-  Performed interviews and process walkthroughs in July and August 2024 with CPPR Department personnel.
-  Performed testing, on a sample basis, to determine if the background check process was followed as described in the *Parish of Caddo Department of Parks and Recreation Operational Policies and Procedures*.
-  Assessed current procedures to determine process improvements and best practices.

The scope period included in the audit was July 2023 – June 2024

Key Phases of Internal Audit



Executive Summary

Based on the procedures performed, five observations were identified. High and moderate priority risk ratings¹ were assigned. Additional details including associated risk, root cause, recommendations, responsible party and management response are included in the Results section of this report.

❖ Three observations were assigned a priority risk rating of high as explained below:

Summary of Observations

Risk Ranking: High

Area: Documentation

1) Documentation intended to track and monitor programs and events, volunteers, and grants was neither centralized nor complete.

Area: Volunteer Background Checks

2) While background check policies and procedures existed, the policy had not been fully implemented in practice. Consequently, background checks were not completed for all volunteers, background checks were not renewed annually, and the procedures per the policy were not consistently followed.

3) There was no process to identify individuals as volunteers at event sign-in or throughout the duration of an event.

❖ Two observations were assigned a priority risk rating of moderate as explained below:

Summary of Observations

Risk Ranking: Moderate

Area: Volunteer Background Checks

4) There was no formal approval process for obtaining background checks, nor was there a formal process to review background check results.

Area: Program and Event Fees

5) Reconciliations were not performed between collected fees and registration data to ensure that all program and event revenues were received.



Executive Summary

Overall Recommendations Summary

Specific recommendations have been included within this report; however, the following presents overall recommendations across in-scope areas.

- Management should consider centralizing documents intended to track and monitor activities throughout the department.
- Management should coordinate with the Finance department to develop and implement a process for monitoring and tracking grants.
- Management should consider updating the *Background Check/Volunteer Policy* to expand upon missing or unclear procedures and ensure that policies and procedures are consistently followed.
- Management should develop a process to monitor background checks to ensure they are renewed every 12 months for active volunteers.
- Management should consider implementing a process for validating the identity of volunteers at event sign-in and to clearly identify and distinguish volunteers at Parish events.
- Management should consider updating the *Background Check Consent Form* to allow for department head approval of the background check. Further, a formal review and approval process should be established for background check results and volunteer eligibility.
- Management should continue their efforts to implement the parks and recreation module within the New World system, with the goal of consolidating all payment and registration data in a single location.
 - In the interim, management should implement a process to manually reconcile payments to registration data for any events held between now and the implementation of the new module.



Results

#	Observation	Risk	Root Cause	Recommendation	Responsible Party & Management Response
Risk Ranking: High					
Area: Documentation					
1	<p>Through discussions with management and inspection of provided documentation, it was determined that documentation intended to track and monitor several activities within the department was not centralized and was independently maintained. Specifically, the following was observed during onsite procedures:</p> <ul style="list-style-type: none"> There was no centralized list used to track all programs and events held by the Parish. It was explained that most events were tracked across separate documents, file types, and file locations maintained by department personnel, but that some events were not tracked in a formal and documented manner. There was no centralized list used to track eligible volunteers for participation in Parish programs and events. While separate lists were maintained by several personnel, it was explained that the volunteer lists were incomplete. Management maintained a list of several funding sources, including external grants, internal funding sources, and donation programs. However, this was not a comprehensive list of all external grants for the department, as it was explained that additional grants were managed by Finance. Additionally, there was no formal, documented process to track compliance, eligibility requirements or renewal deadlines for grants. 	<p>Lack of centralized information could lead to miscommunication and confusion within the department and with other departments that rely on complete and accurate information from Parks & Recreation.</p> <p>Lack of centralized documentation related to events could result in confusion regarding what events are planned or have historically occurred.</p> <p>Maintaining an incomplete roster of eligible volunteers hampers the Parish's ability to identify and approve volunteers for events.</p> <p>If grant compliance is not monitored, the risk of non-compliance with grant requirements increases.</p> <p>If grant eligibility requirements are not maintained and monitored, the Parish may miss deadlines, resulting in loss of funding.</p>	<p>The department recently implemented SharePoint; however, record-keeping and monitoring practices were not yet integrated into the new system.</p> <p>An increased focus on the execution of programs and event took precedence over identifying a streamlined documentation process.</p>	<p>Management should consider centralizing the tracking of events, approved volunteers, and grants into SharePoint. Access to these documents and tracking lists should be restricted to only necessary personnel. Management should evaluate which individuals should have edit access to these lists to ensure documents contain accurate and real-time information.</p> <p>Additionally, management should consider formalizing the tracking and monitoring of grant compliance, requirements and deadlines in SharePoint. To optimize tracking and ensure that it is inclusive of all external funding, management should coordinate with the Finance department to develop and implement a process for monitoring and tracking grants. This process should include defining roles and responsibilities related to renewing, maintaining, and monitoring grants. Once this process is defined, management should document the process.</p>	<p>CPPR Director</p> <p><i>Management Response:</i> The Director will schedule meetings with Finance Dept. and Information Systems representative to establish a formal tracking and monitoring procedure for tracking of events, approved volunteers, and grants into SharePoint. The tracking and monitoring procedure will only allow approved or necessary personnel to access.</p> <p><i>Estimated Completion Date:</i> December 31, 2024</p>



#	Observation	Risk	Root Cause	Recommendation	Responsible Party & Management Response
Risk Ranking: High					
Area: Volunteer Background Checks					
2	<p>Seven volunteers were sampled to determine whether background checks were conducted in accordance with the <i>Background Check/Volunteer Manual</i> within the <i>Parish of Caddo Department of Parks and Recreation Operational Policies and Procedures</i>. During testing procedures and through walkthroughs with management, it was identified that while the <i>Background Check/Volunteer Manual</i> was approved, it had not been fully implemented. Consequently, background checks were not completed for all volunteers, background checks were not renewed annually, and the procedures per the policy had not been followed.</p> <p>The following observations were identified related to the sampled volunteers:</p> <ul style="list-style-type: none"> For four of the seven sampled volunteers, background checks were not completed nor had the prospective volunteers completed the volunteer packet, including required documentation. For one of the seven sampled volunteers, the volunteer was a minor and was not required to go through the volunteer onboarding process. However, the <i>Background Check/Volunteer Manual</i> did not clarify whether a minor could volunteer for Parish events. For two of the seven sampled volunteers, the volunteers 1) did not have completed <i>Volunteer Applications</i> or <i>Background Check Consent Forms</i> on file as required per the policy, 2) were not notified whether they passed or failed the background check, and 3) were not monitored for when background checks were conducted nor were volunteer start dates tracked. Additionally, one of the sample volunteer's background check was not completed within the last 12 months. <p><i>Continued on page 8.</i></p>	<p>Failure to obtain background checks on volunteers could result in accepting volunteers with a criminal record.</p> <p>If volunteers have a criminal record, they could pose a threat to minors and other Parish residents or event participants.</p> <p>Failure to notify individuals of background check results could create confusion among potential volunteers regarding whether they can work at Parish events, which may result in staffing issues at events.</p>	<p>A rapid increase in the volume of events took precedence over executing the background check processes effectively.</p> <p>The CAPRA accreditation process resulted in the adoption of new policies and procedures across the department.</p> <p>However, due to staffing levels within Parks & Recreation, department resources were limited to implement all new procedures.</p> <p>The <i>Background Check/Volunteer Manual</i> was recently adopted, which resulted in discrepancies between the policy and practice.</p>	<p>Management should consider updating the <i>Background Check/Volunteer Manual</i> to include missing or unclear elements. Topics to incorporate include but are not limited to: clarifying whether minors are eligible to volunteer and, if so, the procedures for volunteer approval; determining if the <i>Background Check Consent Form</i> is required; and clarifying whether all volunteers need to undergo background checks.</p> <p>Management should ensure that the <i>Background Check/Volunteer Manual</i> does not include contradicting language. Management should also ensure that policies and procedures are consistently followed for all volunteers. This includes confirming that volunteers complete the necessary documentation prior to their background check, background checks are conducted for all volunteers, volunteers are notified of their background check results, and the Parish renews background checks every year for active volunteers.</p> <p>Further, management should develop a process to monitor background checks to ensure they are renewed every 12 months for active volunteers and are completed prior to the individual beginning work.</p>	<p>CPPR Director CPPR Assistant Director</p> <p><i>Management Response:</i> Director and Assistant Director will update Background Check/Volunteer Manual as recommended, with final approval from Legal Dept. The revised Background Check/Volunteer Manual and use of will be discussed in mandatory staff development meetings throughout the calendar year, to ensure all department staff are informed of all revisions and adhering to respective policies as directed. Director or Assistant Director will be responsible for monitoring/tracking each manager/coordinator Volunteer Background Check submittals through SharePoint, providing random checks and appropriate staff feedback as needed.</p> <p><i>Continued on page 8.</i></p>

#	Observation	Risk	Root Cause	Recommendation	Responsible Party & Management Response
Risk Ranking: High					
Area: Volunteer Background Checks - <i>Continued</i>					
2	<p>In addition, through inspection of the <i>Background Check/Volunteer Manual</i>, it was identified that the following topics were missing or unclear:</p> <ul style="list-style-type: none"> • The policy did not state whether individuals under the age of 18 were eligible to volunteer, and if so, whether background checks should be conducted for them. • The policy did not indicate whether the <i>Background Check Consent Form</i> was required; however, it was explained that this was a required document. • The policy contained conflicting information regarding when background checks were required. The policy stated that background checks were required for all volunteers and that background checks were required only for volunteers working with children and at-risk adults. 	<i>Refer to page 7.</i>	<i>Refer to page 7.</i>	<i>Refer to page 7.</i>	<p>In addition, a process will be implemented to track the background check expiration date. If an applicant chooses to continue volunteering, he/she will have to submit another application for consideration.</p> <p><i>Estimated Completion Date:</i> October 31, 2024</p>



Results

#	Observation	Risk	Root Cause	Recommendation	Responsible Party & Management Response
Risk Ranking: High					
Area: Volunteer Background Checks					
3	Per inspection of one volunteer sign-in sheet for a Parish event, four individuals signed into the event as volunteers but were not included on the Parish's list of approved volunteers. Further, it was explained that there was no established process to identify individuals as volunteers at event sign-in or throughout the duration of an event.	Failure to verify volunteers could result in unauthorized individuals having direct access to minors and other participants or Parish residents.	<i>Refer to root cause on page 7.</i>	Management should consider implementing a process for validating the identity of volunteers upon sign-in, such as by checking personal identification, to ensure that the individual is an approved volunteer. In addition, management should develop a process to clearly identify and distinguish volunteers at Parish events. This process could include providing clearly-marked badges to volunteers upon sign-in, which should be returned to the department at the end of the event to prevent misuse. A reconciliation of volunteer badges issued and returned should be conducted.	<p>CPPR Director CPPR Assistant Director</p> <p><i>Management Response:</i> To validate the identity of an approved applicant, we will have a process in place for the applicant to submit an approved identification card, i.e. State-issued ID card or Driver's License, prior to start date. Approved volunteers will be given a temporary ID badge that will be issued on-site at each event that he or she will be working once he/she has been identified by the on-site Parks and Recreation staff. The volunteer will receive temporary ID badge, sign in and out at each event and will return the temporary badge at the conclusion of each event.</p> <p><i>Estimated Completion Date:</i> November 30, 2024</p>



Results

#	Observation	Risk	Root Cause	Recommendation	Responsible Party & Management Response
Risk Ranking: Moderate					
Area: Volunteer Background Checks					
4	<p>There was no formal approval process for obtaining background checks for volunteers. While there was a space for a supervisor/program coordinator's approval on the <i>Volunteer Application</i> and <i>Background Check Consent Form</i>, this approval was not consistently obtained. Additionally, though the Parish pays for background checks, there was no process in place to obtain department head approval prior to conducting background checks. Further, there was no formal process to review background check results and approve or deny individuals as volunteers.</p>	<p>A lack of formal approval prior to conducting background checks may result in paying for unnecessary background checks.</p> <p>A lack of formal approval of completed background checks could hamper the Parish's ability to identify and track authorized volunteers for participation in events.</p> <p>A lack of formal review and approval of completed background checks could result in unsuitable individuals becoming volunteers.</p>	<p><i>Refer to root cause on page 7.</i></p>	<p>Management should consider updating the <i>Background Check Consent Form</i> to include a space for department head approval of the background check. Once implemented, management should establish a formal review and approval process to ensure that background checks are consistently approved by both the department head and the relevant program coordinator prior to the background check being conducted.</p> <p>Management should also consider implementing a formal review and approval process of background check results to ensure that only properly background checked and authorized individuals are approved as volunteers. This review and approval process should be documented. Further, management should consider documenting the approval processes in the <i>Background Check/Volunteer Manual</i>, along with identifying the individuals responsible for approvals.</p>	<p>CPPR Director CPPR Assistant Director</p> <p><i>Management Response:</i> Director and Assistant Director will update Background Check Consent Forms as recommended, with final approval from Legal Department. Director and Assistant Director will be responsible for tracking and monitoring background check consent forms via an official log.</p> <p>CPPR will create a tracking form for applicant approval or denial, which will include Department Head review of background check. The department will consult with the Legal Department's recommendation of what will determine an ineligible volunteer. The director and Assistant Director will be responsible for tracking and monitoring background checks consent forms, Background Check Result Tracking Form (approval/denial), and an official tracking log.</p> <p>Timelines for tracking will be determined by the Department Head and added to the Policies and Procedures for Administration approval.</p> <p><i>Estimated Completion Date:</i> October 31, 2024</p>



Results

#	Observation	Risk	Root Cause	Recommendation	Responsible Party & Management Response
Risk Ranking: Moderate					
Area: Program and Event Fees					
5	Through discussions with management, it was explained that reconciliations were not performed between collected fees and registration data to ensure that all program and event revenues were received.	<p>Failure to reconcile payment data to registration data may result in ineffective and/or incomplete fee collection.</p> <p>Lack of a reconciliation process could increase the risk of fee misappropriation.</p> <p>If fees are not collected, the lack of program revenues may strain the Parish's budget, hampering the Parish's ability to host future events.</p>	<p>There was confusion between departments as to who was responsible for performing reconciliations between payment and registrant data.</p> <p>Payment data was not centralized and was tracked separately from registration data.</p> <p>Payment reports were incomplete as credit card payments were logged and tracked within the Clover system, but money order payments were managed by Finance. Additionally, due to limitations within the system, payment reports were unable to identify the event associated with each payment within Clover.</p> <p>There was no centralized or complete list to track all programs and events.</p>	<p>Management should continue their efforts to implement the parks and recreation module within the New World system, with the goal of consolidating all payment and registration data in a single location. Management should ensure the new module contains the following abilities: (1) identifying the specific program/event associated with each payment, (2) identifying the specific date associated with each event and payment, and (3) identifying discrepancies between payment and registration data.</p> <p>In the interim, management should consider implementing a process to manually reconcile payments to registration data for any events held between now and the implementation of the new module. This reconciliation should include comparing the total number of registrants to the total amount of fees collected via credit card and money order, to ensure that the correct revenue was collected for each event. In addition, this reconciliation should compare the fee amount collected to the fee amount charged per event marketing to ensure the correct amounts were charged to participants.</p>	<p>CPPR Director</p> <p><i>Management Response:</i> CPPR will continue to work with Finance Dept. staff and New World system provider-Tyler Technologies to fully implement the parks and recreation module within the New World system. In the interim, department staff will continue to use the existing Clover POS system for collection of event registration fees; while working with Finance to implement a temporary process to manually reconcile payments (until the implementation of the new module).</p> <p><i>Estimated Completion Date:</i> Spring 2025</p>



Appendices

Appendix A: Priority Rating Definitions

Appendix B: Assumptions and Limiting Conditions

Appendix C: Transmittal Letter

Appendix A: Priority Rating Definitions

Risk Rating	Definition
High	A serious weakness which exposes Caddo Parish to risks in achieving its objectives or may otherwise impair the Parish's reputation. Generally, a high priority observation can include any of the following: non-compliance with a regulation or internal policy or procedure; or an operational inefficiency, resulting in a material expenditure.
Moderate	A control weakness, which can undermine the system of internal control and/or operational efficiency and should, therefore, be addressed.
Low	A weakness which does not seriously detract from the system of internal control and/or operational effectiveness/efficiency but which should nevertheless be addressed by management.



Appendix B: Assumptions and Limiting Conditions

Our procedures were not designed to detect fraud, to constitute a financial statement audit, review, compilation, or to provide assurance on the internal controls or information provided. Accordingly, we will not express an opinion or conclusion, nor provide any other form of assurance on the completeness and accuracy of the information. Additionally, the projection of any conclusions, based on our findings, to past or future periods is subject to the risk that changes may have occurred during the passage of time that may alter the validity of such conclusions. Furthermore, the projection of any conclusions, based on our findings, to the whole population is subject to the risk that the samples selected may not accurately reflect the population as a whole.

This engagement was conducted in accordance with the American Institute of Certified Public Accountants' Statement on Standards for Consulting Services (SSCS).



Appendix C: Transmittal Letter

September 11, 2024

Caddo Parish Commission
505 Travis St #110
Shreveport, LA 71101

Ms. Erica Bryant, Parish Administrator and CEO
The Parish of Caddo
P.O. Box 1127
Shreveport, LA 71163-1127

Ms. Bryant and Caddo Parish Commission,

As presented in this enclosed report, EisnerAmper has completed our evaluation regarding Parks and Recreation policies, procedures, and processes related to volunteer background checks, program and event fees, and ongoing monitoring of grants. On the pages above, this report provides: 1) a risk rating of observations, 2) a summary of the observations noted during our engagement, and 3) recommended actions for you to consider related to our observations.

These recommendations are only for your consideration and are not intended to be implemented without management's thorough understanding and acceptance.

EisnerAmper appreciates the cooperation and assistance provided by your personnel during this engagement. We sincerely appreciate this opportunity to be of service to you. Please do not hesitate to contact us if you have any questions related to this report or any other matters.

Sincerely,

EAG Gulf Coast, LLC





This publication is intended to provide general information to our clients and friends. It does not constitute accounting, tax, or legal advice; nor is it intended to convey a thorough treatment of the subject matter.

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